

Sophia S. Lau, Esq. (Nevada Bar No. 13365)  
*slau@earlysullivan.com*  
EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP  
8716 Spanish Ridge Avenue, Suite 105  
Las Vegas, Nevada 89148  
Telephone: (702) 331-7593  
Facsimile: (702) 331-1652

Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HSBC BANK, NATIONAL  
ASSOCIATION, AS TRUSTEE FOR THE  
HOLDERS OF GSAA HOME EQUITY  
TRUST 2005-15 ASSET-BACKED  
CERTIFICATE SERIES 2005-15, a  
National Banking Association,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE  
INSURANCE COMPANY,

Defendant.

Case No.: 2:19-cv-00333-RFB-BNW

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO COMPLAINT**

**(First Request)**

Plaintiff HSBC Bank, National Association, as Trustee for the Holders of the GSAA Home Equity Trust 2005-15 Asset-Backed Certificate Series 2005-15 (hereinafter "HSBC"), and Defendant Fidelity National Title Insurance Company ("Fidelity"), by and through their counsel of record, hereby stipulate as follows:

**WHEREAS**, HSBC filed its Complaint in this matter on February 25, 2019 (ECF No. 1);

**WHEREAS**, Fidelity was served with the Summons and Complaint on or about May 28, 2019;

**WHEREAS**, counsel for Fidelity was only recently retained and requires additional time to respond to the Complaint;

1           **WHEREAS**, this is the first stipulation for an extension of Fidelity's time to respond to the  
2 Complaint; and

3           **WHEREAS**, HSBC has agreed to extend Fidelity's time to respond to the Complaint to  
4 July 2, 2019.

5           Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
6 and agree as follows:

- 7           1. Fidelity shall file its response to the Complaint in this matter on or before July 2, 2019.  
8           2. Fidelity intends to preserve its right and does not expressly waive any and all defenses  
9 listed in Fed. R. Civ. P. 12(b), including with respect to whether it is subject to personal  
10 jurisdiction in this forum.

11 Dated this 18th day of June 2019

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

12  
13 By: /s/ Sophia S. Lau  
Sophia S. Lau, Esq.  
Nevada Bar No. 13365  
14 8716 Spanish Ridge Avenue, Suite 105  
15 Las Vegas, Nevada 89148

16 Attorneys for Defendant  
Fidelity National Title Insurance Company

17 Dated this 18th day of June 2019

WRIGHT, FINLAY & ZAK, LLP

18 By: /s/ Christina V. Miller  
19 Christina V. Miller, Esq.  
Nevada Bar No. 12448  
20 7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117

21 Attorneys for Plaintiff  
22 HSBC Bank, National Association, as Trustee for  
the Holders of the GSAA Home Equity Trust 2005-15  
23 Asset-Backed Certificate Series 2005-15

24 **ORDER**

25 **IT IS SO ORDERED:**

26 By: Brenda Weksler  
BRENDA WEKSLER  
27 U.S. MAGISTRATE JUDGE

Dated: June 20, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ Kevin S. Sinclair

Kevin S. Sinclair  
EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP